

Exhibit 1

**\*\*UNCERTIFIED ROUGH DRAFT\*\***

DEPOSITION OF DANI CHEHAK

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1 question that you need to review it, you let me  
2 know.

3 A. Okay. So there's three things. Steve  
4 starts an e-mail, Laura responds. Steve, it goes  
5 in that.

6 Q. That's right.

7 A. Okay.

8 Q. That's right.

9 A. Okay. Let me get the context of how it  
10 started.

11 Q. All right. Ms. Chehak, in Exhibit 45,  
12 the top e-mail on the thread is a April 29, 2024,  
13 e-mail from Steve Teixeira?

14 A. Yeah.

15 Q. And in this e-mail, Mr. Teixeira  
16 complains about discrimination he's encountered  
17 due to his cancer.

18 A. Uh-huh.

19 Q. Do you recall that?

20 A. Yes. It's written.

21 Q. And in response to that discrimination  
22 complaint, did you instruct anyone to investigate?

23 A. The legal team.

24 Q. And did you hire an outside investigator?

25 A. The legal team would be the one to answer

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1 that question.

2 Q. Well, I don't want to know about your  
3 communications with the legal team, but I want to  
4 know if an outside investigator was hired?

5 A. Yes.

6 Q. Do you know who that was?

7 A. Yes.

8 Q. Who was it?

9 A. DLA.

10 Q. Do you remember who the contact was at  
11 DLA?

12 A. The legal team could tell you that.

13 Q. When did that happen?

14 A. Very quickly after this e-mail.

15 Q. After the April 29, e-mail?

16 A. After the claim of discrimination, yes.  
17 I went to the legal team, and they'd be best able  
18 to tell you the date of -- of hiring someone. I  
19 don't know.

20 Q. If you look at the first e-mail on the  
21 thread, which I told you we wouldn't do. But if  
22 you'll take a moment now --

23 A. Okay.

24 Q. -- to look at it. Actually, set that  
25 aside. I changed my mind.

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1 A. Okay.

2 Q. Are you aware whether the -- an  
3 investigator was hired before or after  
4 Mr. Teixeira was placed on administrative leave  
5 around May 23?

6 A. I am not.

7 Q. And who would know that?

8 A. The legal team.

9 Q. When do you say the legal team, are you  
10 talking about the external legal team or the in  
11 house lawyers?

12 A. The in house lawyers. Sorry. I'm  
13 pointing because they're at the end of the table.

14 Q. Right -- right. Is there anything else  
15 you did to respond to this discrimination  
16 complaint for Mr. Teixeira?

17 A. Yeah I made sure that we got our legal  
18 team working on the claim.

19 Q. Anything else?

20 A. No.

21 Q. Did you discuss it with anyone else in  
22 your department?

23 A. No.

24 Q. Did you discuss it with Ms. Chambers?

25 A. That would have been for the legal team

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1 to move forward.

2 Q. I see. In your experience as an HR  
3 professional and a chief people officer, is it  
4 unusual for there to be an investigation of a  
5 discrimination complaint without talking to the  
6 complainant?

7 A. No.

8 Q. That happens?

9 A. Is it unusual?

10 Q. Yes.

11 A. And I said no. All right. Hold on. Is  
12 unusual for it to not --

13 Q. Let me start.

14 A. Two negatives.

15 Q. There's a double negative.

16 A. It's okay. Let's --

17 Q. Yeah.

18 A. We'll break it down.

19 Q. Yeah. In your experience as an HR  
20 professional and the chief people officer --

21 A. Right.

22 Q. -- is it typical when investigating a  
23 discrimination complaint that the complainant be  
24 interviewed?

25 A. Yes.

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1 Q. And it would you find it very unusual for  
2 that not to happen?

3 MR. TODARO: Object to form.

4 BY MR. HARRINGTON:

5 Q. If you understand that question.

6 A. Okay. I would find it usual that would  
7 happen. I would find it unusual when it didn't.

8 Q. And do you know why that did not happen  
9 in this case?

10 MR. TODARO: Objection. And you can  
11 answer to the extent you can answer without  
12 revealing conversations you've had with Counsel.

13 THE DEPONENT: Yeah. So I don't.

14 MR. TODARO: If you have an  
15 understanding -- if you have an understanding  
16 independent of a conversation with Legal Counsel,  
17 then you can answer.

18 THE DEPONENT: I -- I don't have any  
19 understanding independent of Legal Counsel.

20 BY MR. HARRINGTON:

21 Q. Have you ever been involved in an  
22 investigation of a discrimination complaint where  
23 the complainant was not interviewed?

24 A. No.

25 Q. Would you consider that inconsistent with

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1 best practices for HR?

2 MR. TODARO: Object to form. Foundation.

3 Incompletely hypothetical. Go ahead.

4 BY MR. HARRINGTON:

5 Q. You may answer.

6 A. Would you repeat it?

7 Q. Would you consider an investigation of a

8 discrimination complaint that does not interview

9 the complainant inconsistent with best practices

10 for HR?

11 MR. TODARO: Same objection.

12 THE DEPONENT: If HR is doing the

13 investigation, we would have interview -- we

14 interviewed the complaint as well. Yes.

15 BY MR. HARRINGTON:

16 Q. And that's a best practice?

17 A. Yes.

18 THE REPORTER: Exhibit 63 marked.

19 BY MR. HARRINGTON:

20 Q. Ms. Chehak, you've been handed Exhibit 63

21 to your deposition. In this exchange, by text

22 message between you and Ms. Chambers, you write,

23 "Just got done with Golf and have Steve at 3:30.

24 Saw the e-mails, Ray Slack Exchange. Point of no

25 return for Steve." Did I read that correctly?



1 I mean, your time with the company started --

2 A. In November of 2022.

3 Q. Was TK Law retained prior to 2022?

4 A. Prior to my November of 2022. Okay.

5 Q. I understand that. My question to you  
6 is, do you know whether TK Law was retained prior  
7 to 2022?

8 A. I don't -- I don't know.

9 Q. Okay. So TK Law was at least engaged by  
10 Mozilla Corporation for three months that we know  
11 of when you were on the job? Plus an unknown  
12 number of additional months?

13 A. I think that's right.

14 Q. Do you know if the scope of that  
15 engagement changed over time?

16 MR. TODARO: You can answer that, yes or  
17 no.

18 THE DEPONENT: No.

19 BY MR. HARRINGTON:

20 Q. It did not change over time, or you don't  
21 know?

22 A. I don't know.

23 Q. Do you know if TK Law generated a report?

24 A. Yes.

25 Q. And who received that report?

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1 A. It went to Mitchell, and I believe  
2 Carlos.

3 Q. Anyone else?

4 A. No.

5 Q. Did you ever see the report?

6 A. I saw it after that.

7 Q. Okay. My question earlier was, who did  
8 the report go to? You answered Mitchell and  
9 Carlos?

10 A. Yes.

11 Q. It also went to you?

12 A. Mitchell and Carlos shared it with me.

13 Q. I see. Who all has seen the report?

14 A. Mitchell, Carlos, me, and lastly Gray,  
15 which was Mitchell's Chief of Staff.

16 Q. Was the existence of the retention of TK  
17 law known to people at the company generally  
18 outside of leadership?

19 MR. TODARO: Object to form. Foundation.  
20 You can answer if you know.

21 THE DEPONENT: Yeah. Can you tell me  
22 again? Was the existence?

23 BY MR. HARRINGTON:

24 Q. Yeah. Yeah. I guess what I'm asking is,  
25 were the rank and file employees aware that the

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1 company had retained a law firm to report on  
2 DEI-type issues?

3 A. My -- my experience is, yes, that that  
4 Mitchell was very transparent in that?

5 Q. Yes. Did everyone at the company know  
6 about this? I mean, was it announced it in all  
7 hands?

8 A. I wasn't there. So -- so I don't know.

9 Q. Was it ever discussed in a company-wide  
10 setting or written about in a company-wide setting  
11 while you were there?

12 A. Yes.

13 Q. Okay. And what setting was that?

14 A. I think probably in what we call  
15 leadership forums, which are where employees can  
16 ask questions. Is probably where it was  
17 discussed?

18 Q. Yes. And what was the discussion?

19 A. I think along the lines of, is TK still  
20 here doing this work is, you know, people were  
21 interviewed for the work, I understand, you know,  
22 what's the next step. So I think it was really  
23 the logistics of it.

24 Q. That the logistics of it were shared with  
25 the rank and file of the company. Was there an

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1 expectation that the -- some sort of result or  
2 report would be shared with the company more  
3 broadly?

4 MR. TODARO: Object to form.

5 THE DEPONENT: I don't know what the  
6 original expectation was or -- or what Mitchell's  
7 expectations and agreement was or vision for it.  
8 So I don't know.

9 BY MR. HARRINGTON:

10 Q. Was there an expectation among the  
11 employees at the time that you did work for the  
12 company that you were aware of that some sort of  
13 result from the TK law report or from TK Law would  
14 be shared with the company more broadly, beyond  
15 management?

16 MR. TODARO: Object to form. Foundation.  
17 Go ahead.

18 THE DEPONENT: Again, I don't know what  
19 their expectation was. And so when I -- when I  
20 think about your question, is there an expectation  
21 by the employees? That the results would be  
22 shared? Is that your question?

23 BY MR. HARRINGTON:

24 Q. Some sort of result or information from  
25 TK Law would be shared with the company?

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1 A. I'd say I think there was expectation  
2 that if there was something we could do better,  
3 we'd do it better.

4 Q. Well, I guess I'm -- I'm asking about  
5 some sort of work product or some sort of report  
6 or some sort of result or some sort of information  
7 coming out of TK Law's work, that the expectation  
8 was.

9 A. That was me and my active listening.  
10 Yeah, problem.

11 Q. Based on what you knew when you were  
12 employed, when you first started at the company,  
13 and when you overlapped with the work of TK Law.  
14 And based on what you heard in the context of  
15 these public discussions that related to TK law,  
16 did you understand there to be an expectation  
17 among employees that some sort of result would be  
18 shared with the employees?

19 MR. TODARO: Object to form.

20 THE DEPONENT: I think there were pockets  
21 that -- that, yes, that was an expectation. There  
22 were pockets of employees that thought they would  
23 see the information.

24 BY MR. HARRINGTON:

25 Q. What made them think that?

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1 A. I'm trying to --

2 Q. And it's I appreciate course. Can if you  
3 can combine that to a yes or no answer?

4 MR. TODARO: If you know.

5 THE DEPONENT: So an asked the question  
6 again.

7 BY MR. HARRINGTON:

8 Q. Were there facts reported upon in the TK  
9 Law report?

10 MR. TODARO: Same instruction.

11 BY MR. HARRINGTON:

12 Q. Based on its work based on the work of TK  
13 Law?

14 A. I don't know.

15 Q. You've read the report?

16 A. I did.

17 Q. Were there facts reported in the report?

18 MR. TODARO: Objection. Asked and  
19 answered.

20 THE DEPONENT: I don't know.

21 BY MR. HARRINGTON:

22 Q. Was there a summary of this report  
23 created?

24 A. Yes.

25 Q. And did you prepare that summary?

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1 A. I did.

2 Q. And who has now received that summary?

3 A. I shared the results that summary, the  
4 results with the steering company.

5 Q. Anyone else?

6 A. Most likely the People Business Partners.

7 Q. How many people is that?

8 A. Probably three people.

9 Q. And they are direct reports of yours?

10 A. They are.

11 Q. When was this summary of the TK Law  
12 report distributed to the steering committee and  
13 the People Business Partners?

14 A. A long time ago. When was that, maybe?  
15 I'd be guessing big time.

16 Q. During your first year of employment?

17 A. Yes.

18 Q. When you drafted the summary of the TK  
19 Law report, was it reviewed by counsel before you  
20 distributed to the steering committee and the  
21 People --

22 A. Business Partners.

23 Q. Business Partners?

24 A. Yes.

25 Q. Did the summary that you prepared of the